

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
-vs-	)	<b>Case No. CR-14-170-D</b>
	)	
<b>WES YUI CHEW,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION FOR AN ACCEPTANCE  
OF RESPONSIBILITY ADJUSTMENT**

The United States hereby moves this Court to grant an additional 1-level downward adjustment to the defendant for acceptance of responsibility under U.S.S.G. § 3E1.1(b).

The Sentencing Guidelines provide that, in addition to the 2-level downward adjustment for acceptance of responsibility, under certain circumstances a defendant may be awarded an additional 1-level downward adjustment:

(b) If the defendant qualifies for a decrease under subsection (a), the offense level determined prior to the operation of subsection (a) is level **16** or greater, and upon motion of the government stating that the defendant has assisted authorities in the investigation or prosecution of his own misconduct by timely notifying authorities of his intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and permitting the government and the court to allocate their resources

efficiently, decrease the offense level by 1 additional level.

U.S.S.G. § 3E1.1(b).

According to the revised Presentence Investigation Report, the defendant's adjusted offense level, before any adjustment for acceptance of responsibility, is 29. The U.S. Probation Officer has recommended that defendant receive a 2-level downward adjustment for acceptance of responsibility under U.S.S.G. § 3E1.1(a). If the Court affirms that recommendation and grants the 2-level adjustment, the government moves for an additional 1-level downward adjustment. The defendant has assisted the government in the investigation and prosecution of this matter by timely notifying it of his intention to plead guilty, thereby permitting the government to efficiently allocate its prosecutorial resources.

WHEREFORE, the government moves the Court under U.S.S.G. § 3E1.1(b) to grant the defendant an additional 1-level downward adjustment for acceptance of responsibility.

Respectfully submitted,

SANFORD C. COATS  
United States Attorney

s/ Chris M. Stephens  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2015, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Dan Webber and Mary Kate Walters, Counsel for Mr. Chew.

s/ Chris M. Stephens  
Assistant U.S. Attorney